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Counsel to the GUC Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§ Case No. 20-32633-SGJ
	§
STUDIO MOVIE GRILL HOLDINGS, LLC, <i>et al.</i> , ¹	§ Chapter 11
	§
Debtors.	§ Jointly Administered

**STIPULATION AND AGREED ORDER EXTENDING
CLAIMS OBJECTION DEADLINE SOLELY AS TO STORE CLAIMANTS**

Advisory Trust Group, LLC (the “**GUC Trustee**”), solely in its capacity as GUC Trustee of the GUC Trust (the “**GUC Trust**”), STORE Capital Acquisitions LLC (“**STORE Capital**”), and STORE Master Funding III, LLC (“**STORE III**” and, together with the GUC Trust and STORE Capital, the “**Parties**”)² hereby stipulate and agree as follows:

WHEREAS, on February 21, 2021, (a) STORE Capital filed a general unsecured claim against Debtor Studio Movie Grill Holdings, LLC, designated as Claim No. 575 by the Claims Agent in the above-captioned proceedings (the “**STORE Capital Claim**”); and (b) STORE III filed four general unsecured claims against certain of the Debtors, designated as Claim Nos. 576 through 579 by the Claims Agent (collectively, the “**STORE III Claims**” and, together with the STORE Capital Claim, the “**STORE Claims**”); and

WHEREAS, pursuant to the *Order Granting GUC Trustee and Reorganized Debtors'*

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.donlinrecano.com/Clients/smgh/Index>.

² STORE Capital and STORE III are collectively referred to herein as the “**STORE Claimants**.”

Joint Motion for Entry of an Order Further Extending the Deadline to Object to Claims [Docket No. 1168] (the “**Claim Objection Deadline Order**”),³ the Claims Objection Deadline is September 12, 2022; and

WHEREAS, the Parties continue to discuss and reconcile the STORE Claims and, in order to conserve resources and in furtherance of the efficient resolution of the foregoing, the Parties have agreed to a limited extension of the Claims Objection Deadline, solely as to the STORE Claims.

NOW, THEREFORE, THE GUC TRUST AND THE STORE CLAIMANTS STIPULATE AND AGREE THAT:

1. The above recitals are incorporated as if fully set forth herein.
2. The Parties agree that the Claims Objection Deadline, solely as to the STORE Claims, shall be extended to and including September 30, 2022.

AGREED AND SUBMITTED BY:

Dated: September 12, 2022

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Steven W. Golden
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³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Claim Objection Deadline Order.

Dated: September 12, 2022

BALLARD SPAHR LLP

By: /s/ Michael S. Myers
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Counsel to the STORE Claimants

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of September, 2022, a true and correct copy of the foregoing document was served on all parties consenting to electronic service of these cases via the Court's CM/ECF system for the Northern District of Texas.

/s/ Steven W. Golden
Steven W. Golden